

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 HARRY CARPENTER, )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

CRIMINAL NO. 85-353

FILED

OCT 2 1985

At 8:30  
ALLYN Z. LITE

INFORMATION

The United States Attorney Charges:

Count One

On or about December 21, 1982, in the District of Newark, defendant Harry Carpenter, an officer and Chairman of the Board of Directors of W.S. Kirkpatrick, Inc., a domestic concern, caused the use of a means and instrumentality of interstate commerce, that is, a Western Union international telex to order Standard Chartered Bank of New York to pay \$580,973.00 to the Bank of New York for the account of Bank of Commerce and Credit International in Luxembourg corruptly in furtherance of an Offer, payment, promise to pay and authorization of the payment of money to:

- (a) a person, that is Benson "Tunde" Akindele through two companies, Deriks and Los, Panamanian bearer share corporations, while having reason to know that a portion of such money would be offered, given, or promised, directly or indirectly to foreign officials, Nigerian Air Force

officers, the Party of Nigeria, the Minister of Nigeria and other government defense personnel for the purpose of influencing the acts and decisions of such foreign officials and others in their official capacity and inducing them to use their influence within the Government of Nigeria in order to obtain a contract for flight training equipment for W.S. Kirkpatrick, Inc.

All in violation of Title 15, United States Code,  
Section 78dd-2.

Respectfully submitted,

  
\_\_\_\_\_  
Thomas W. Greelish  
United States Attorney

  
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Steven M. Levy  
Fraud Section  
U.S. Department of Justice

  
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Laurence R. Maddock  
Chief, Fraud Division  
United States Attorney's Office

Attorneys for the Plaintiff  
United States of America